

**B. TIME LIMIT EXTENSIONS**

**Purpose:** Federal and state laws allow us to extend up to 20% of the TANF caseload beyond sixty months due to family violence or hardship. Each state defines what is a hardship extension in their state. When Congress created the 20%, it recognized that despite the hard work of case managers, there are clients with serious and long-term barriers to employment and self-sufficiency.

On November 6, 2001, Governor Gary Locke announced Washington State's Time Limit Extension policy. At the same time the Governor announced strengthened participation and sanction standards.

The extension policy outlined three major categories for extensions detailed in the WAC below:

1. Extensions for clients who cannot or should not be expected to work (exempted from mandatory participation);
2. Extensions for clients who are participating and "playing by the rules," including clients covered by the Family Violence Option; and
3. Child SafetyNet Payment for children of non-participating adults.

Effective June 1, 2002

**WAC 388-484-0006 TANF/ SFA time limit extensions.****(1) What happens after I receive 60 or more months of TANF / SFA cash assistance?**

After you receive 60 or more months of TANF/SFA cash assistance, you may qualify for additional months of cash assistance. We call these additional months of TANF/SFA cash assistance a TANF/SFA time limit extension.

**(2) Who is eligible for a TANF/SFA time limit extension?**

- (a) You are eligible for a TANF/SFA time limit extension if you are on TANF or otherwise eligible for TANF and:
- (b) You qualify for one of the exemptions listed in WAC 388-310-0350; or,
- (c) You are

- (i) Participating satisfactorily in the WorkFirst Program (See WAC 388-310 for a description of WorkFirst participation requirements); or
- (ii) Meet the Family Violence Option criteria in WAC 388-61-001 and are participating satisfactorily in specialized activities listed in your individual responsibility plan; or
- (d) If you are refusing to participate as required, and you do not have a good reason under WAC 388-310-1600(4), you do not qualify for a regular TANF/SFA time limit extension but your family may qualify for a Child SafetyNet Payment extension, described in WAC 388-310-1650.

**(3) Who reviews and approves an extension?**

- (a) Your case manager or social worker will review your case and we will use the case staffing process to determine which extension type will be approved. Case staffing is a process to bring together a team of multidisciplinary experts including relevant professionals and you to identify issues, review case history and information, and recommend solutions.
- (b) This review will not happen until after you have received at least 52 months of assistance but before you reach your time limit.
- (c) During the case staffing, we will tell you about the different extensions. If you are in sanction (See WAC 388-310-1600), we will explain the consequences of continued non-participation and tell you the steps you must take to end the sanction. We will explain that continued failure to participate will result in your getting a Child SafetyNet Payment with additional restrictions after the 60th month.
- (d) After the case staffing and before you reach your time limit, the department will send you a notice that tells you whether your extension was approved, how to request a fair hearing if you disagree with the decision, and any changes to your IRP that were made as a result of the case staffing.

**(4) Do my WorkFirst participation requirements change if I receive a TANF/SFA time limit extension?**

Your participation requirements do not change. You must still meet all of the

WorkFirst participation requirements listed in WAC Chapter 388-310 while you receive a TANF/SFA time limit extension.

**(5) Do my benefits change if I receive a TANF/SFA time limit extension?**

- (a) You are still a TANF/ SFA recipient. If you are:
  - (i) Receiving a regular TANF/SFA time limit extension, your cash assistance, services, or supports will not changes as long as you continue to meet all other TANF/SFA eligibility requirements.
  - (ii) Receiving a Child SafetyNet Payment, your benefits will be different and are described in WAC 388-310-1650.
- (b) During the TANF/ SFA time limit extension, you must continue to meet all other TANF/ SFA eligibility requirements. If you no longer meet TANF/ SFA eligibility criteria during your extension, your benefits will end.

**(6) What happens if I stop participating in WorkFirst activities as required during a TANF/SFA time limit extension?**

If you do not participate in the WorkFirst activities required in your Individual Responsibility Plan, and you do not have a good reason under WAC 388-310-1600(4), the department will follow the sanction rules in WAC 388-310-1600, and will move you into Child SafetyNet Payment which will reduce your benefits (See WAC 388-310-1650).

**(7) How long will a TANF/SFA time limit extension last?**

- (a) We will review your TANF/SFA time limit extension and your case periodically for changes in family circumstances:
  - (i) If you are extended under WAC 388-484-0006 (2)(a) then we will review your extension at least every 12 months;
  - (ii) If you are extended under WAC 388-484-0006 (2)(b) then we will review your extension at least every 6 months;
  - (iii) If you are extended under WAC 388-484-0006 (2)(c) then we will review your extension at least every 12 months.

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| <ul style="list-style-type: none"><li>(b) Your TANF/SFA time limit extension may be renewed for as long as you continue to meet the criteria to qualify.</li><li>(c) If during the extension period we get proof that your circumstances have changed, we may review your case and change the type of TANF/SFA time limit extension.</li></ul> |
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## CLARIFYING INFORMATION

### 1. Definitions of exemption, extension, and deferral:

- a. **Exemption** – a long-term, severe barrier that prevents the client from being able to get or keep a job. The client is exempted from participation in WorkFirst since the barrier often cannot be addressed through services. It can happen at any time. It is also a reason why a client will be extended beyond 60 months. (See WAC 488-310-0350 and WorkFirst Handbook chapter 6.8 with examples of deferrals and exemptions)
- b. **Deferral** – a short-term status that enables the client to address/ resolve issues that impair the client's ability to get and keep employment. The client participates in activities to resolve the barrier and is often deferred from participation in job search.
- c. **Extension** – allows the assistance unit to receive TANF/ SFA beyond the 60-month time limit. There are three main categories of extensions in the chart below.

## 2. Table of the 3 extension categories

The Extensions fall into three main categories. These are broken into sub-categories which identify the reasons why they are extended.

| Category 1<br><b>Exempt</b>  | Category 2<br><b>Participating</b>   | Category 3<br><b>Child SafetyNet Payment</b>   |
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| <p>Applies to:</p> <ul style="list-style-type: none"> <li>• Older caretaker relative</li> <li>• Adult with chronic and severe disability including facilitated applicants for SSI or other federal disability benefits</li> <li>• Caring for a child with special needs</li> <li>• Caring for an adult with disabilities</li> <li>• The exemption criteria WorkFirst Handbook chapter 3.7 and 6.8</li> </ul> | <p>Applies when the client is:</p> <ul style="list-style-type: none"> <li>• Participating in WorkFirst activities</li> <li>• A Family Violence Option client and participating in FVO activities</li> <li>• Resolving barriers to employment</li> <li>• Caring for an infant less than four months old.</li> </ul> | <ul style="list-style-type: none"> <li>• Payments made for the benefit of the children of adults who are not participating.</li> </ul> |

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| <p>The exemptions make the client exempt from participation. Clients who are exempt will continue to receive assistance and will be extended beyond 60 months.</p> | <p>Clients who are participating satisfactorily in any of the approved WorkFirst participation components, or are included in the family violence option and participating in FVO activities, will be extended as long as they continue to participate and meet all other eligibility criteria. These clients are often referred to as those "playing by the rules." This includes clients whose participation may include resolving barriers to employment in a deferral (X-codes). Examples include temporary incapacity, homelessness, resolving legal issues, etc.</p> | <p>Differs from the other two extension categories. Under a Child SafetyNet Payment, the extension is for the benefit of the child of an adult who is not participating. This is to provide a minimal safety net for the children who would otherwise be cut off. Adults in sanction status at the 60th month or after, result in the family receiving a CSNP. The CSNP is administered through a protective payee, who uses it for verified rent, utilities, and other expenses for the child.</p> |
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### 3. Who is eligible for an extension?

The time clock screen ("TICS") in ACES tracks the number of months received for each adult client. Once the first adult in the assistance unit reaches the 60th month, the only way the assistance unit can continue to receive TANF/ SFA is to be approved for an extension. The extension is applied at the assistance unit level. The first month clients could reach their time limit is on August 1, 2002.

- a. Extensions are for assistance units with at least one countable adult who has received 60 or more months of TANF/ SFA cash assistance.
- b. Extensions may be renewable.
- c. Clients who have received 60 or more months and are re-applying are also eligible for extensions. ACES will require the extension to be approved and entered first or the case will be denied as over the time limit.

- d. During the extension, all other TANF/ SFA eligibility requirements must be met. Someone who has been extended for 12 months and goes over income after six months would no longer be eligible for TANF/ SFA or the extension for TANF/ SFA.
4. **When should clients be reviewed for an extension?**
- a. Assistance units which contain an adult within three months of reaching their time limit. Schedule them for a time limit case staffing process.
  - b. Assistance units whose current extension is expiring.
  - c. Applicants who have received 60 or more months of TANF/ SFA and are otherwise eligible for TANF/ SFA.
5. **Length of extensions:**
- a. Extensions are to be reviewed at the end date of the extension and at least every 12 months for exempt and CSNP clients and every 6 months for participating clients.
  - b. Extensions may be renewable.
  - c. Extensions continue as long as the client meets all other eligibility criteria.

## **WORKER RESPONSIBILITIES**

- 1. Use e-JAS Ad Hoc reports to pull lists of cases approaching their time limit and review WACs on exemptions, participation, and the Child SafetyNet Payment. Schedule cases approaching their time limit for 60-month extension case staffing. See step-by-step instructions in WorkFirst Handbook 3.7.
- 2. During the case staffing, explain extensions to clients, especially the differences for clients moving from a sanction into a Child SafetyNet Payment category.
- 3. After determining which extension category the family qualifies for in the case staffing, fill in the time limit extension analysis in the e-JAS case-staffing module with the category, sub-categories, and length of extension.
- 4. Based on that form, go to the new ACES TWEP (twenty percent) screen and enter one of the three main extension categories and the length of extension.

ACES will send the 025-05 letter informing the client of extension category and length of extension. The extension should be no longer than 12 months and no shorter than three months. **The extension must be entered into ACES or the assistance unit will be terminated.**

5. Before the current extension ends, ACES will generate an alert 45 days before the end date. Before the end of the extension period, a review is required. If necessary, complete a new case staffing. At the review, obtain all necessary documentation to determine if the participant qualifies for another extension, complete the Extension Analysis in E-JAS, and enter the main TANF extension code on the ACES TWEP screen
6. If during the extension, information is received that family circumstances have changed, review the case and adjust the extension as indicated. If during the extension the client no longer meets the other TANF/ SFA eligibility criteria, such as over income or resources, youngest child turns 18, etc., terminate the case for that reason code.